

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA KEY,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR MANUFACTURING)	
ALABAMA, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

DEFENDANT DYNAMIC SECURITY, INC.’S EXHIBIT LIST

Defendant Dynamic Security, Inc. (“Dynamic” or “Defendant”), submits its exhibit list for trial of this case. Dynamic identifies each exhibit it expects to present or use during trial.

Ex.	Description	Bates Nos.
1.	Deposition Transcript of Plaintiff Davita Key	N/A
2.	Dynamic Pre-Employment Screening form for Plaintiff (DX 2 to Plaintiff’s Deposition)	Dynamic-Key 000028 and Key 000013
3.	Plaintiff’s Paycheck Stub from Dynamic totaling 2.25 hours on July 21, 2017, and August 1, 2017) (DX 3 to Plaintiff’s Deposition)	Key 000001
4.	Email dated 7-21-2017 from Robinson to Plaintiff	Key 000254-000255
5.	HEA Appearance Standards for Security Personnel (DX 8 to Plaintiff’s Deposition/PX 9 to Williams’ Deposition)	HEA 0001-0003
6.	HMMA PPE and Dress Code Matrix (DX 9 to Plaintiff’s Deposition)	HMMA 000003

7.	Dynamic Policy Acknowledgement and Receipt of Employee Handbook signed by Plaintiff July 21, 2017; Harassment policy; Security Officer's Handbook(DX 10 to Plaintiff's Deposition)	Dynamic-Key 000041-000042 and Key 000332-000382
8.	HEA's Employee Handbook Cover and Table of Contents (DX 11 to Plaintiff's Deposition)	HEA 0004-0005
9.	HMMA Contractor Safety, Security, and Fire Protection Handbook (DX 12 to Plaintiff's Deposition)	Key 000277-000331
10.	EEOC Intake Questionnaire dated August 2, 2017, against Hyundai (DX 13 to Plaintiff's Deposition)	Key 000049-000056
11.	EEOC Charge Number 846-2017-32787 dated August 3, 2017, against Dynamic Security (DX 14 to Plaintiff's Deposition)	Dynamic-Key 000046-000047
12.	EEOC Charge Number 420-2019-00128 filed October 16, 2018 against HMMA (DX 15 to Plaintiff's Deposition)	Key 000047
13.	Handwritten letter from Plaintiff dated August 8, 2017, to EEOC refuting items in statement of Gloria Robinson "concerning my discharge from HMMA." (DX 17 to Plaintiff's Deposition)	Dynamic-Key 000058-000063
14.	Plaintiff's "official complaint of discrimination against Hyundai, Ms. Cassandra Williams, and Ms. Gloria Robinson" (DX 18 to Plaintiff's Deposition) handwritten complaint - 8-1-2017	Dynamic-Key 000063
15.	Signed Acknowledgement of Dynamic Security Officer's Manual dated 07-21-2017 ((DX 19 to Plaintiff's Deposition)	Dynamic-Key 000041
16.	Signed Acknowledgment of Dynamic's Harassment Policy dated 07-21-2017 (DX 20 to Plaintiff's Deposition)	Dynamic-Key 000042
17.	Signed Acknowledgement of Dynamic's Rules and Regulations dated 07-21-2017 (DX 21 to Plaintiff's Deposition)	Dynamic – Key 000038-000039
18.	"Dismissal and Notice of Rights" (EEOC Charge No. 846-2017-32787) finding no reasonable cause for discrimination by Dynamic mailed by the EEOC to Plaintiff and Dynamic on March 1, 2019. (DX 22 to Plaintiff's Deposition).	N/A 2 pages

19.	Letter of Determination mailed by the EEOC (EEOC Charge No. 420-2019-00128) to Plaintiff and HMMA on June 10, 2019, reporting a finding of reasonable cause to conclude Respondent HMMA violated Title VII (DX 23 to Plaintiff's Deposition)	N/A 2 pages
20.	Letter mailed by the EEOC (EEOC Charge No. 420-2019-099128) to Plaintiff and HMMA on July 12, 2019, reporting unsuccessful conciliation efforts (DX 24 to Plaintiff's Deposition)	N/A 1 page
21.	Notice of Right to Sue – Conciliation Failure (EEOC Charge No. 420-2019-099128) mailed by the EEOC to Plaintiff and Respondent HMMA on July 12, 2019 (DX 25 to Plaintiff's Deposition)	N/A 4 pages
22.	"Rebuttal" letter from Plaintiff to EEOC dated "October 4, 2017" responding to Dynamic's Statement of Position (Charge Number 846-2017-32787) (DX 26 to Plaintiff's Deposition)	N/A 2 pages
23.	Letter from Plaintiff dated October 4, 2017, to Alabama Department of Labor asserting she was wrongfully terminated and was not offered other employment by Dynamic (Exhibit 29 to Plaintiff's Deposition)	N/A 2 pages
24.	Letter of Intent	HEA0280
25.	Invoice for Security Services	HMMA000580
26.	HEA Organizational Chart	
27.	August 1, 2017, email from Cassandra Williams to Gloria Robinson and Ray Curenton	Dynamic-Key 000085
28.	Security Officer's Handbook	Key 000333-000382
29.	HEA Appearance Standards for Security Contractors (PX 63 to Williams' Depo.)	HEA 0163-0166
30.	Internal Email dated March 20, 2019, establishing Dynamic's receipt of Notice of Right to Sue on or before March 20, 2019 (PX 32 to Riddle Depo.)	Dynamic-Key 000043-000048
31.	Envelope from EEOC to Dynamic Security that contained Dynamic's copy of Right to Sue, postmarked February 28 2019 (PX 54 to Riddle Depo.)	Dynamic-Key 000285
32.	Exhibits to Deposition of Ray Cureton - Part 1 of 2	N/A

33.	Exhibits to Deposition of Ray Cureton – Part 2 of 2	N/A
34.	Exhibits to Deposition of Kristal Riddle	N/A
35.	Exhibits to Deposition of Sherry Spires	N/A
36.	August 1, 2017, email from Sherry Spires to Ray Cureton	
37.	July 31, 2017, email from Ray Cureton to Gloria Robinson	Dynamic-Key 000086
38.	July 31, 2017, email from Gloria Robinson to Ray Cureton	
39.	Gloria Robinson statement regarding removal	Dynamic-Key 000033-00035
40.	Assignment Refusal Forms	Dynamic-Key 000029-000030
41.	Plaintiff's Application for Employment	Dynamic-Key 000294-000295
42.	Latunya Howell Statement	Dynamic-Key 000067
43.	Ray Cureton Statement	Dynamic-Key 000036
44.	Nicole Scavella Statement	Dynamic-Key 000037
45.	HMMA Mailroom Job Description	HEA0194-0195
46.	Picture of Plaintiff	HEA0193
47.	Emails between J. Baxter and Cassandra Williams and Gloria Robinson	HEA0206=0210
48.	Plaintiff's Response to Dynamic's Interrogatories	
49.	Plaintiff's Response to Dynamic's Request for Production	
50.	Plaintiff's Response to Dynamic's Request for Admissions	
51.	Key Description of Incident	Key00384-00385
52.	Key's 2017-2022 Tax Forms	
53.	Key's 2021 W2	
54.	Key's job search emails	Key0131-0248
55.	Email from Gloria Robinson to Key	Key001049-001050
56.	Email from Gloria Robinson to Sherry Spires and Ray Cureton dated August 2, 2017	Dynamic-Key 000031
57.	Emails between Gloria Robinson and Ray Cureton	HEA0051-0052

58.	August 2, 2017, email from Gloria Robinson to Ray Curenton and Sherry Spires	Dynamic-Key 000073
59.	Key response to Department of Labor	Key000024-000029
60.	Contract for Services between HE and HMMA	HMMA000013- 000039
61.	July 27, 2016, letter of extension of Contract	HMMA000543
62.	Key W-2 from Kelly Services	S000044
63.	Determination of ADOL Hearing Officer	
64.	PowerPoint – sexual harassment in the workplace	Dynamic-Key 000093-000111
65.	PowerPoint - EEOC – what does it mean to me	Dynamic-Key 000112-000139
66.	Dynamic – Policies and Procedures AA & EEOC 2-1500A - Revision #1 March 2013- Revised: June 2020	Dynamic-Key 000270-000271
67.	Dynamic - Policies and Procedures – Harassment in the Workplace 2-1600 – Revision #2 - Revised- August 2012	Dynamic-Key 000272-000273
68.	Dynamic – Policies and Procedures Affirmative Action & EEOC 2-1500 – Revision #3 Revised – March 2013	Dynamic-Key 000274-000275
69.	Dynamic Policies and Procedures – Harassment in the Workplace 2-1600 – Revision #4 - Revised June, 2020	Dynamic-Key 000276-000279
70.	Dynamic – Policies and Procedures AA & EEOC PROGRAM 2-1500A Revision # March 2013	Dynamic-Key 000282-000283
71.	Dynamic Security, Inc. job description	Dynamic-Key 000284
72.	Email dated 8/2/2017 re: personnel briefing posted in roll call room	Dynamic-Key 003216-003219
73.	Email dated 8/10/2017 re: offer of available job sites to Plaintiff	Dynamic-Key 003220-003223
74.	Key resume	Key00034-00036
75.	Emails between Key and EEOC	Key00037-00040
76.	Correspondence received from EEOC	Key00041-00045
77.	November 29, 2019, email to EEOC	Key000093
78.	Emails to and from EEOC and Key	Key00094-000113

79.	February 25, 2019, email from EEOC	Key000112
80.	June 12, 2019, email to EEOC	Key000109
81.	July 1, 2019, email to EEOC	Key000108
82.	September 30, 2019, email to EEOC	Key000104
83.	March 22, 2018, email to EEOC	Key000100-000101
84.	August 21, 2018, email to EEOC	Key000099
85.	Emails between Key and EEOC re Hyundai	Key000097
86.	Emails between Key and EEOC dated July 1 and July 2, 2019, regarding Charge 420-2019-00128	Key000108
87.	Picture of Key's hair	Key000274
88.	Transcript of unemployment compensation hearing	Key1051-1075
89.	Signed Acknowledgement of Dynamic's Performance Standards dated 07-21-2017	Dynamic-Key 000040
90.	Email from Sherry Spires to Ray Curenton dated August 9, 2017	Dynamic-Key 000051
91.	Email from Ray Curenton to Sherry Spires dated August 9, 2017	Dynamic-Key 000051
92.	Email from Ray Curenton to Sherry Spires dated August 8, 2017	Dynamic-Key 000056-000066
93.	August 1, 2017, email from Sherry Spires to Gloria Robinson to Ray Curenton	Dynamic-Key 000073-000074
94.	July 31, 2017, email from Gloria Robinson with excerpt of policy	Dynamic-Key 000078-000079
95.	July 31, 2017, email from Tracy Peoples	Dynamic-Key 000078
96.	August 1, 2017, email from Ray Curenton to Sherry Spires	Dynamic-Key 000082-000084
97.	August 29, 2017, email from Ray Curenton to Sherry Spires	Dynamic-Key 000140-000141
98.	August 1, 2017, email from Ray Curenton to Sherry Spires	Dynamic-Key 000143-000144
99.	August 1, 2017, email from Sherry Spires to Ray Curenton and Gloria Robinson	Dynamic-Key 003218-003219
100.	Ray Curenton email to Sherry Spires dated August 30, 2017	Dynamic-Key 003250

Respectfully submitted,

/s/ Wesley C. Redmond

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on 26th day of January, 2023, he electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to:

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